

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

<b>DERRICK PERSON</b>	:	
	:	
<b>v.</b>	:	<b>C.A. 1:22-cv-00043-WES-LDA</b>
	:	
<b>PATRICIA COYNE-FAGUE, alias, et al.</b>	:	

**STATE DEFENDANTS’ OBJECTION TO PLAINTIFF’S MOTION TO AMEND  
COMPLAINT**

State Defendants, the Rhode Island Department of Corrections (“RIDOC”), Patricia Coyne-Fague (“Defendant Coyne-Fague”), Ruiz Diniz (“Defendant Diniz”), Silka Disla (“Defendant Disla”), Amelia Elling (“Defendant Elling”), Lorraine Ware (“Defendant Ware”), and Cynthia Smith (“Defendant Smith”), in their official and individual capacities, and Jennifer Clarke (“Defendant Clarke”) in her official capacity only (collectively the “State Defendants”), hereby object to Plaintiff’s motion to amend the complaint and request this Honorable Court deny Plaintiff’s request to amend the complaint with respect to all proposed amendments except for the correction of Defendant Denise’s name to her full name, Denise Desjardins, throughout the complaint.

Pursuant to LR Cv 7, State Defendants respectfully request that oral arguments be held on this matter and expect that an hour should suffice.

A memorandum in support is filed as an attachment to this motion.

Respectfully submitted,

STATE DEFENDANTS,

By:

PETER F. NERONHA  
ATTORNEY GENERAL

*/s/ Tiffany A. Parenteau*

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**CERTIFICATION**

I hereby certify that on this 17th day of June 2022, the within document was electronically filed and served on all counsel of record via the ECF system and it is available for viewing and downloading.

*/s/ Tiffany A. Parenteau*